

KEKER
VAN NEST
& PETERS

LATHAM & WATKINS LLP

MORRISON FOERSTER

January 27, 2025

Hon. Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

cc: All Counsel of Record (via ECF)

Re: *The New York Times Company v. Microsoft Corporation, et al.*, Case No. 1:23-cv-11195

Dear Judge Stein:

On behalf of the OpenAI defendants,¹ we write pursuant to Rule 2.F of Your Honor's Individual Practices to respectfully request oral argument on OpenAI's objection to Magistrate Judge Wang's December 2 orders. ECF 371–372.

Respectfully,

KEKER, VAN NEST &
PETERS LLP*

/s/ Andrew F. Dawson
Andrew F. Dawson

LATHAM & WATKINS
LLP

/s/ Elana Nightingale Dawson
Elana Nightingale Dawson

MORRISON & FOERSTER
LLP

/s/ Rose S. Lee
Rose S. Lee

* All parties whose electronic signatures are included herein have consented to the filing of this document.

¹ OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.